

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

VS. :

LINDA REYES
LUIS MORALES
and
EUDY GONZALEZ,

Defendants :

INDICTMENT

THE GRAND JURY CHARGES:

FILED
SCRANTON

JAN 21 2014
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PER *LL* DEPUTY CLERK

Count 1

In or about November 2013 and continuing to the present, in Wayne and Luzerne Counties, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the Defendants,

LINDA REYES
LUIS MORALES
and
EUDY GONZALEZ,

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, both known and unknown to the Grand Jury, to commit the following offenses against the United States, namely, to knowingly, intentionally and unlawfully

distribute, and possess with intent to distribute, in excess of 100 grams of heroin, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the objectives of the conspiracy included, among others, the following:

1. The defendants and/or their co-conspirators would obtain the controlled substances from suppliers in Philadelphia, Pennsylvania.
2. After the controlled substances were obtained, the defendants and/or their co-conspirators would transport the controlled substances to the Allentown, Pennsylvania area for further distribution to customers in Hazleton, Luzerne County, in return for money or other valuable consideration.
3. The defendants and/or their co-conspirators used cellular phones and prison phones in Wayne County, Pennsylvania, to arrange drug transactions and to communicate with drug associates and customers.

OVERT ACTS

The defendants and/or their co-conspirators committed the following overt acts, among others, in furtherance of the conspiracy:

1. In or about November 2013, the defendant Eudy Gonzalez arranged from S.C.I. Waymart to have heroin obtained in Philadelphia and transported to the Allentown area for distribution to others.
2. In or about December 2013, the defendant Eudy Gonzalez arranged from S.C.I. Waymart to have heroin obtained in Philadelphia and transported to the Allentown area.
3. On or about November 27, 2013, the defendant Linda Reyes sent a text message and conversed on the phone regarding the planned distribution of heroin to another person.
4. On or about December 12, 2013, the defendants Linda Reyes and Luis Morales transported heroin from Philadelphia to the Allentown Service Plaza off the Northeast Extension of the Pennsylvania Turnpike.
5. On or about December 12, 2013, the defendant Linda Reyes distributed heroin to another person at the Allentown Service Plaza off

the Northeast Extension of the Pennsylvania Turnpike.

6. On or about January 1, 2014, in the defendant Linda Reyes sent and received text messages related to a planned heroin transaction wherein heroin would be distributed to a another person at the Allentown Service Plaza off the Northeast Extension of the Pennsylvania Turnpike for further distribution to customers in Hazleton, Luzerne County, Pennsylvania.

7. On or about January 4, 2014, the defendants Linda Reyes and Luis Morales transported heroin from Philadelphia to the Allentown Service Plaza off the Northeast Extension of the Pennsylvania Turnpike.

All in violation of Title 21, United States Code, Section 846.

A TRUE BILL

Date: 1-21-14



Grand Jury Foreperson



PETER J. SMITH

United States Attorney